

Exhibit "A"

Evans C. Agrapidis, Esq. ID#036881983
 LEANZA, AGRAPIDIS & MAROULES, P.C
 777 Terrace Avenue, Suite 504
 Hasbrouck Heights, New Jersey 07604
 (201) 288-0500
 ATTORNEYS FOR PLAINTIFF

FILED
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 MAY 26 2017
 SUPERIOR COURT OF NEW JERSEY
 COUNTY OF HUDSON
 CIVIL DIVISION #5

Beshoy H. Zaky,	: SUPERIOR COURT OF NEW JERSEY
	: LAW DIVISION: HUDSON COUNTY
	: DOCKET NO.: HUD-L-
Plaintiff,	: L-2204-17
v.	: CIVIL ACTION
Sean Welsh,	:
Delli Santi Bulk Transportation and	:
Trucking, LLC,	:
AND JOHN DOE I-III,	:
Defendants.	:

COMPLAINT AND JURY DEMAND

Plaintiff, Beshoy H. Zaky, residing in the City of Bayonne, County of Hudson, in the State of New Jersey, by way of Complaint against the defendants, hereby alleges and says:

FIRST COUNT

1. At all times hereinafter mentioned, plaintiff, Beshoy H. Zaky, was the operator of a 2007 Lincoln Wagon, License Plate #017689H NJ, owned by AMS Limousine, Inc. Said vehicle was traveling east on Bayview Avenue at the intersection of Caven Point Road in the City of Jersey City, County of Hudson and in the State of New Jersey on or about November 5, 2015, at approximately 9:14 a.m.

2. At all times hereinafter mentioned, defendant, Sean Welsh, presently residing in Albrightville, PA., was the operator of a 2014 SPCO Trailer, License Plate #AG30311, PA., owned by the defendant, Delli Santi Bulk Transportation and Trucking, LLC. Said vehicle was traveling east on Bayview Avenue at the intersection of Caven Point Road in the City of Jersey City, County of Hudson and in the State of New Jersey on or about November 5, 2015, at approximately 9:14 a.m., when defendant struck plaintiff's vehicle.

3. John Doe I-III are unknown to plaintiff, who thereby brings suit against those

defendants by fictitious name. At all times hereinafter mentioned, defendants John Doe I-III, are believed to be the owner or operator of the vehicle which is unknown to plaintiff. The full extent of those facts linking the fictitiously designated defendant with this cause of action is unknown to plaintiff at this time.

4. As a result of defendants' unlawful and negligent operation and control of their vehicles, plaintiff was caused to suffer serious injuries as defined in N.J.S.A. 39:6A-8, et seq., which has caused him great pain and suffering substantially interfering with his daily activities.

5. These injuries necessitated him obtaining immediate and continuous medical treatment, caused him pain and suffering, interfered with his employment, and daily activities, and left him with recurring disabilities which will in the future cause additional pain and suffering necessitating future expense.

6. Additionally, plaintiff has suffered non-economic loss greater than the basic non-economic loss defined in the statute. The parties are covered persons as defined in N.J.S.A. 39:6A.

WHEREFORE, plaintiff, Beshoy H. Zaky, demands Judgment against defendants, Sean Welsh, Delli Santi Bulk Transportation and Trucking, LLC, and John Doe I-III, jointly and severally, for damages and pain and suffering and emotional distress, lost wages, and property damage, together with attorney's fees, interest, costs of suit and any other relief as the Court deems just and equitable.

LEANZA, AGRAPIDIS & MAROULES, P.C
Attorneys for Plaintiff

By: 
EVANS C. AGRAPITIS, ESQ.

Dated: May 16, 2017

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues raised in the Complaint.

LEANZA, AGRAPIDIS & MAROULES, P.C
Attorneys for Plaintiff

By: 
EVANS C. AGRAPIDIS, ESQ.

DATED: May 16, 2017

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Jerry Maroules, Esq., is hereby designated as Trial Counsel of this matter.

LEANZA, AGRAPIDIS & MAROULES, P.C
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ.

DATED: May 16, 2017

CERTIFICATION

I certify that pursuant to R.4:5-1, to my knowledge and based on the information available to me at this time, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding and that no additional parties are known at this time who should be added.

LEANZA, AGRAPIDIS & MAROULES, P.C
Attorneys for Plaintiff

By: 
EVANS C. AGRAPIDIS, ESQ.

DATED: May 16, 2017

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendants provide answers to the uniform interrogatories set forth in Form C and C(1) of Appendix II of the Rules Governing the courts of the State of New Jersey.

LEANZA, AGRAPIDIS & MAROULES, P.C
Attorneys for Plaintiff

By: 
EVANS C. AGRAPIDIS, ESQ.

DATED: May 16, 2017